Supreme Court of the United States

No. 11, Orig.

OCTOBER TERM, 1952.

THE STATE OF MISSISSIPPI,
Complainant,
vs.
THE STATE OF LOUISIANA,
Defendant.

MOTION FOR LEAVE TO FILE BILL OF COMPLAINT

and

BILL OF COMPLAINT.

HUGH L. WHITE,
Governor of The State of Mississippi,
Jackson, Mississippi,

J. P. COLEMAN,
Attorney General of The State of Mississippi,
Jackson, Mississippi.

G. H. BRANDON,
of BRANDON, BRANDON, HORNSBY & HANDY,
Natchez, Mississippi,
Special Assistant Counsel.

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Supreme Court of the United States

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OCTOBER TERM, 1952.

THE STATE OF MISSISSIPPI,
Complainant,

vs.

THE STATE OF LOUISIANA,
Defendant.

MOTION FOR LEAVE TO FILE BILL OF COMPLAINT.

To the Honorable Fred M. Vinson, Chief Justice of the Supreme Court of the United States of America, and Associate Justices:

The State of Mississippi, one of the states of the United States of America, appearing herein through Hugh L. White and J. P. Coleman, the Governor and the Attorney General, respectively, of said state, and the undersigned special assistant counsel, moves for permission to file herein its Bill of Complaint in equity against the State of Louisiana, another state of the United States of America, and in support hereof shows:

(1)

The action arises out of a controversy and dispute existing between the said two states as to a portion of the boundary between them.

(2)

The original jurisdiction of this court is established under Section 2 of Article III of the Constitution of the United States of America.

(3)

The institution of this action has been specifically authorized pursuant to Senate Bill No. 522, Laws of Mississippi of 1952, enacted by the Legislature of the State of Mississippi at its 1952 Session, and approved by the governor of said state on April 11, 1952.

(4)

The adjudication thereof by this Court is necessary to settle this controversy existing between the States of Mississippi and Louisiana and to fix and establish the location of the true boundary line in dispute.

Respectfully submitted,

(s) Hugh L. White,

HUGH L. WHITE,
Governor of The State of Mississippi,
Jackson, Mississippi,

(s) J. P. Coleman,

J. P. COLEMAN,
Attorney General of The State of Mississippi,
Jackson, Mississippi.

G. H. Brandon,

G. H. BRANDON,
of BRANDON, BRANDON, HORNSBY & HANDY,
Natchez, Mississippi,
Special Assistant Counsel.

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BILL OF COMPLAINT.

To the Honorable Fred M. Vinson, Chief Justice of the Supreme Court of the United States of America, and Associate Justices:

The Complainant, the State of Mississippi, one of the states of the United States of America, appearing herein through Hugh L. White, Governor of said state, and J. P. Coleman, Attorney General thereof, and special assistant counsel, with leave of your Honorable Court first obtained, presents this its suit against the State of Louisiana, another state of the United States of America, and, with due respect, the Complainant avers:

(1)

That a controversy has arisen between Complainant, the said State of Mississippi, and the said State of Louisiana relative to a portion of the boundary line between those two states; that no agreement can be had or reached between said states settling said boundary; and that it is necessary that same be determined by judgment of your Honorable Court in the exercise of its original jurisdiction.

(2)

Your Complainant further alleges that the State of Mississippi was entered into the Union of the United States of America by and pursuant to Act of Congress of March 1, 1817, found in Chapter 28 of the United States Statutes at Large, Volume 3, page 348, approved March 1, 1817, the resolution accepting the State of Mississippi into the Union, being dated December 10, 1817, and is found in Volume 3, pages 472-3, United States Statutes at Large, approved December 10, 1817, and in said Act of Congress the boundaries of the State of Mississippi were described as follows:

> "Beginning on the River Mississippi, at the point where the southern boundary line of the State of Tennessee strikes the same, thence east along the said boundary line to the Tennessee River; thence up the same to the mouth of Bear Creek, thence by a direct line to the northwest corner of the County of Washington, thence due south to the Gulf of Mexico, thence westwardly including all the islands within six leagues of the shore, to the most eastern junction of Pearl River with Lake Borgne, thence up said river to the thirty-first degree of north latitude, thence west along said degree of latitude to the Mississippi River, thence up the same to the beginning."

(3)

Your Complainant further alleges that the State of Louisiana was admitted into the Union of the United States of America by Act of Congress found in Chapter 50 of the United States Statutes at Large, Volume 2, page 701, approved April 8, 1812, and therein the boundaries of said State of Louisiana, in the preamble of said Act, were described as follows:

> "Whereas, the representatives of the people of all that part of the territory or country ceded under the name of 'Louisiana' by the treaty made at Paris on the 30th day of April, 1803 (8 Stat. at L. 200) between the United States and France contained within the following limits, that is to say:
>
> "Beginning at the mouth of the river Sabine; thence by a line drawn along the middle of said river, including all islands to the 32nd degree of latitude; thence due north to the northern most part of the 33rd degree of north latitude; thence along said parallel of latitude to the River Mississippi; thence down said river to the River Iberville; and from thence along the middle of said river to Lakes Maurepas and Pontchartrain to the Gulf of Mexico; thence bounded by said Gulf to the place of beginning * * * etc."

That by Act of Congress, found in the United States Statutes at Large, Volume 2, page 708, Chapter 57, approved April 14, 1812, additional territory was added to the then existing State of Louisiana, which added territory gave to the State of Louisiana all that territory south of the 31st degree of north latitude lying between the Mississippi River and the Pearl River, and extending down the Pearl River to the Gulf of Mexico, but for reasons shown it is not necessary to particularly define said additional territory.

(4)

That according to the foregoing descriptions the western boundary of that portion of the State of Mississippi lying between the 33rd and 31st degrees of north latitude and the eastern boundary of that portion of the State of Louisiana lying between the 33rd and 31st degrees of north latitude were formed by the Mississippi River, beginning at the northeast corner of the State of Louisiana, as hereinabove described, and extending south to the 31st degree of north latitude; and to that extent the boundaries between the two states as fixed in the foregoing descriptions were identical, in that the thread or center of said river formed said boundaries originally. That the said boundary was also declared and recognized by the Constitution of the State of Mississippi as the original western boundary of that part of the State of Mississippi between the 33rd and 31st degrees of north latitude.

(5)

That Warren County, State of Mississippi, is on the Mississippi River, between the 33rd and 31st degrees of north latitude.

That in said County of Warren, State of Mississippi, there are large tracts of land known as Diamond Island, Diamond Island Towhead and Diamond Point, which are each and all part of the territory of the State of Mississippi.

(6)

As to the said tract of land now known as Diamond Island and Diamond Island Towhead, which the Complainant claims and contends is a part of and within the territorial limits of the State of Mississippi and forms a part

of the State of Mississippi over which the Complainant exercises its sovereignty, the Complainant avers as follows, to-wit:

That because of the changes in the course of the navigable stream of the Mississippi River, effected over the years since the boundaries between the State of Louisiana and the State of Mississippi were fixed and established by Acts of Congress as aforesaid, said Diamond Island or Diamond Island Towhead (the names and designations being now used interchangeably), which now forms one body of land, is now situated to the westerly side or right side of the present navigable stream of the Mississippi River and is joined in part to the Louisiana shore; but despite said fact the same has ever been and is now within the territorial limits of the County of Warren and State of Mississippi; and in support of the foregoing allegation of fact, Complainant charges and avers with reference to the formation of said land known as Diamond Island and as Diamond Island Towhead the following, to-wit:

That at the time when the State of Louisiana was admitted to the Union as a state by Act of Congress as aforesaid, the boundary of the State of Louisiana at the point and place where said Diamond Island or Diamond Island Towhead is presently situate (the same being south of the 32nd degree of north latitude and north of the River Iberville) was designated as being down the Mississippi River—the thread or center of said river forming said boundary originally; and by the aforesaid Act of Congress of the United States of March 1, 1817, entitled, "An Act to Enable the People of the Western Part of Mississippi Territory to Form a Constitution and State Government, and for the Admission of said State into the

Union, on an Equal Footing with the Original States"— pursuant to which the State of Mississippi was formed and admitted to the Union as a state, the western boundary of the territory to be included within said state north of the 31st degree of north latitude and south of the southern boundary of the State of Tennessee was designated as being up the Mississippi River, and that the thread or center of said river formed said boundary originally.

That the County of Warren, State of Mississippi, is, as aforesaid, on the Mississippi River north of the 31st degree of north latitude and north of said River Iberville and south of said 33rd degree of north latitude and south of the southern boundary of the State of Tennessee.

That thereafter at the place where said Diamond Island or Diamond Island Towhead is now located and opposite the original mainland of said Warren County, Mississippi, the land on the Mississippi River in the State of Louisiana gradually wore off by erosion and caved into the Mississippi River and disappeared, while at or near said point the shore or bank of the Mississippi River on the Mississippi side was gradually extended in a westerly direction by accretions formed successively and imperceptibly to the soil of said shore until it extended westerly as a point of land projecting westwardly to the place where the most westerly portion of said Diamond Island or Diamond Island Towhead is now located; that as the Mississippi shore or bank along the Mississippi River was thus extended in a westerly direction by alluvium formed by accretion, the thalweg or thread of the channel of the Mississippi River was likewise extended in a westerly direction; that as the thread of said channel was thus extended westwardly the boundary line between the States of Louisiana and Mississippi was also extended westwardly in like manner and

in like distances, remaining at all times to the north, west and south of the point or projection of land thus formed and attached to the Mississippi shore.

That after the boundary line between the said states had been thus extended westerly so as to include within the territorial limits of the State of Mississippi the land which is presently known and designated as Diamond Island and as Diamond Island Towhead and which was formed as a point of land formed by accretion to the Mis sissippi shore and as a part of the territorial limits of the State of Mississippi, the Mississippi River cut across said point of land through a chute thereby forming what is known as a chute cut-off, so doing by avulsi n, forming a new but minor channel across said point of land, thereby cutting off a portion thereof from the Mississippi mainland and forming an island which was thereafter known and designated as Diamond Island or Diamond Island Towhead; but yet in so doing, the Mississippi River yet flowed in a main channel around to the north, west and south of said Diamond Island or Diamond Island Towhead, leaving the same yet upon the Mississippi side of the then main channel of the Mississippi River; and said island when so formed was, continued to be, and now is within and a part of the territorial limits of the State of Mississippi and the County of Warren in said state.

That thereafter the new channel which was thus formed by the action of the Mississippi River in cutting across said point of land through said chute cut-off and making said chute cut-off did gradually widen and deepen over a period of years and the old or original channel which lay to the north, west and south of said Diamond Island or Diamond Island Towhead was gradually filled by sedimentation and accretion, in most part formed, de- posited and accreted to the said island, and hence to terri-

tory of the State of Mississippi, and in small part formed to the Louisiana mainland, until finally the new channel thus formed as above alleged became the principal or main channel of the Mississippi River and the old channel was gradually filled by accretion, deposition and alluvium until finally the said accretions formed to said island in most part and that formed in small part to the Louisiana mainland met at certain places and the water of the Mississippi River ceased to flow at low stages therein and between said Diamond Island or Diamond Island Towhead, Mississippi shore, and the Louisiana mainland shore.

That the said Diamond Island or Diamond Island Towhead never washed away and at the time said new channel of the Mississippi River was formed by the action of that river in cutting across said point of land through said chute cut-off and forming said island, the line between the States of Louisiana and Mississippi was in and thereafter remained in the center of the old channel which flowed to the north, west and south of said point of land and of the land thus formed into an island designated as Diamond Island or Diamond Island Towhead, and which old channel was and is to the north and west of the new channel made by the action of the river in cutting across said point of land through said chute cut-off. That when the water thus ceased to flow through said old channel as above described and became stagnant, the boundary line between the States of Louisiana and Mississippi then became fixed in the middle or thread of the old navigable channel and was not afterward affected or changed by the filling up of the said old channel, and that said line is now the boundary line between said States of Louisiana and Mississippi at that place; and all the territory and land which formed said Diamond Island or Diamond Island Towhead and all the accretion land that has formed thereto since said is-

land was formed, being all that lying to the south, east and north of said old channel, was, remained and is the land known and designated as Diamond Island or Diamond Island Towhead and accretion thereto and all is in Warren County, State of Mississippi, and it is that land so thus formed that now constitutes Diamond Island or Diamond Island Towhead being in Warren County, State of Mississippi to the north, west and south of which the line between the State of Mississippi on the one part and the State of Louisiana on the other part lies.

(7)

That as to said point of land known as Diamond Point which lies generally to the south of the hereinabove referred to tract and body of land known as Diamond Island and Diamond Island Towhead, the Complainant, without reiterating the allegations hereinabove made and contained with reference to the location and designation of the original boundary between the States of Louisiana and Mississippi, does aver that the same was formed as a point of land by accretion and the deposition of alluvium to the Mississippi mainland by gradual deposition during the course of the movement and action of the Mississippi River hereinabove described which successively formed the point of land that by the chute cut-off became Diamond Island or Diamond Island Towhead and which by subsequent accretion to said Diamond Island or Diamond Island Towhead formed a larger body of land constituting, as aforesaid, the large body known as Diamond Island or Diamond Island Towhead as same presently exists; and shows and avers that at the point or place and in the vicinity of where the said Diamond Point is now situate, and which forms a part of Warren County, Mississippi, the land on the Mississippi River originally in the State of Louisiana gradually wore off by erosion and caved into

the Mississippi River and disappeared, while at or near said point and in the vicinity thereof the shore or bank of the Mississippi River on the Mississippi side was gradually extended in a westerly and northwesterly direction by accretions formed successively and imperceptibly to the soil of said Mississippi shore until it extended westwardly and northwestwardly as a point of land projecting in that direction to, where and over which said Diamond Point is now located; that as the Mississippi shore or bank along the Mississippi River was thus extended in a westerly and northwesterly direction by alluvium formed by accretion, the thalweg or thread of the channel of the Mississippi River was likewise extended in a westerly and northwesterly direction; that as the thread of said channel was so thus extended, the boundary line between the States of Louisiana and Mississippi was also extended westwardly and northwestwardly in like manner and in like distances, remaining at all times to the northwest and west of the point or projection of land thus formed and attached to the Mississippi shore and known as Diamond Point.

That after the boundary line between the said states had been thus extended northwestwardly and westwardly so as to include within the territorial limits of the State of Mississippi the land which is presently known and designated as Diamond Point and which was formed as a point of land by accretion to the Mississippi shore and as a part of and hence within the territorial limits of the State of Mississippi; and in about the year 1933, the Corps of Engineers of the United States, acting in conjunction with the Mississippi River Commission of the United States, in work for the improvement of navigation of the Mississippi River and flood control, did make and effect an artificial cut-off across the neck of said point of land at or near the most

easterly of Mississippi mainland shore base thereof, thereby forming a new channel of the Mississippi River and thereby cutting off said Diamond Point from the mainland of the State of Mississippi and artificially forming an island which yet, however, remains known and designated as Diamond Point; but yet when such was done the Mississippi River continued to flow in its main channel around said Diamond Point for some time; and said island when so thus artificially formed was, continued to be, and now is within and a part of the territorial limits of the State of Mississippi and Warren County in said state.

That thereafter the new artificial channel thus made as above described over the years has deepened and widened and has become the main channel for flow of the waters of the Mississippi River and for navigation and the old or original channel which prior to the making of said artificial cut-off lay to the north, northwest and west of said Diamond Point has been gradually filled by sedimentation and accretion in most part formed to said Diamond Point in Mississippi except where such accretion has formed to Diamond Island or Diamond Island Towhead in Mississippi, and in small part such sedimentation and accretion in the old thread of the river has formed to the Louisiana mainland, until finally the old channel has in large part been gradually filled and closed by sedimentation and accretion and the water of the Mississippi River has ceased to flow at low stages therein around said Diamond Point: That said Diamond Point has not washed away and the line between the States of Louisiana and Mississippi to the northwest of said Diamond Point at its westerly extent and to the west thereof to where the old river channel connects with Palmyra Lake (in which the boundary between the State of Louisiana and the State of Mississippi lies to the west of what is known as Davis Is-

land) became fixed in the middle of the old navigable channel and was not thereafter affected or changed by the making of the artificial cut-off aforesaid or the filling up of said old channel.

(8)

The Complainant avers that in the vicinity where this dispute exists the line between the State of Louisiana and the State of Mississippi is as follows:

> Beginning at a point where the present thalweg or center of the navigable thread of the Mississippi River flowing southwardly intersects the line designated as the line demarcating 32 degrees 15 minutes of north latitude and flowing down the same to the point where the present thread or thalweg of the Mississippi River intersects the point where such thalweg or thread did lie at the time when, as aforesaid, the waters of the Mississippi River last ceased to flow around and to the north, west and south of Diamond Island or Diamond Island Towhead; from thence along the line of what was the thread or thalweg of the Mississippi River at the time when the waters of the Mississippi River last ceased to flow around to the north, west and south of) said Diamond Island or Diamond Island Towhead, following the course thereof across the body of alluvium and accretion that has since formed; from thence around the said originally formed island known as Diamond Island which was cut off by said chute cut-off as aforesaid (i. e. to the north, west and south thereof) to the point where said line intersects the line of the thread or thalweg of the main channel of the Mississippi River as it existed and flowed around Diamond Point prior to the date of the artificial cut-off known as Diamond Cut-Off made by the United States Engineers and the Mississippi River Commission in 1933; from thence westwardly and southwardly to the north and west of said Diamond Point in the channel or thread or thalweg of the Mis-

sissippi River as same existed when the waters of the Mississippi River last ceased to flow around Diamond Point as a result of the making of said artificial Diamond Cut-Off; and thence to the point where same enters into or intersects the original thread of the stream of the Mississippi River as it once flowed through what is now Palmyra Lake, that is to say, where same intersects the approximate line of 91 degrees 07 minutes west of Greenwich.

(9)

That the controversy between the State of Louisiana and the State of Mississippi has arisen from the following facts:

Complainant is advised that officials of the State of Louisiana deny the facts hereinabove set forth and alleged as to the changes made by erosion, alluvium, deposition, making of chute cut-off, artificial cut-off, and the like, and the legal effect thereof as altering the position of the original boundary between the States of Mississippi and Louisiana and fixing the same along the line contended for by the State of Mississippi as hereinabove set forth; the State of Louisiana has encroached upon the sovereignty of the State of Mississippi by levying taxes or attempting to levy taxes upon lands that are thus within the territorial limits of the State of Mississippi and within its sovereignty and jurisdiction; and citizens of the State of Louisiana and persons claiming title under citizens of the State of Louisiana or claiming title under the laws of the State of Louisiana are asserting title to lands on the Mississippi side of the boundary between the states as hereinabove described as being within the State of Louisiana contrary to the sovereign rights and powers of the State of Mississippi and to the rights and titles by the State of Mississippi accorded to its citizens and persons claiming

title to lands under and by virtue of the laws of the State of Mississippi; wherefore, as aforesaid, it is necessary that the line between the states and the boundary between the states at the points hereinabove designated be settled and determined by judgment of this Honorable Court in the exercise of its original jurisdiction. That is to say, it is necessary that the boundary between the State of Mississippi and the State of Louisiana be determined by judgment of this Honorable Court in the exercise of its original jurisdiction on and along the western boundary of Warren County and more particularly within and between the points particularly described as follows, to-wit:

> Beginning at a point where the thalweg of the Mississippi River, as it now flows, crosses the line of 32 degrees 15 minutes of north latitude, and extending from thence to a point where the said boundary in the old bed of the Mississippi River now known as Palmyra Lake crosses the meridian line 91 degrees and 7 minutes west of Greenwich.

(10)

That Complainant attaches hereto maps, surveys, charts and other documents and makes same a part hereof, and they are marked exhibits, as follows:

(1) Copy of Map No. 31 with title made by Captain Young from reconnaissance survey of 1821, scale of lengths 1 inch to 1 mile, scale of breadths 2 inches to 1 mile, and copy of table of conventional signs for use with said map.

(2) Copy of sketch map of Lieutenant Ross entitled "Course of the River Mississippi from the Balise to Fort Chartres" of date 1765.

(3) Copy of map of Captain Pittman entitled "A Draught of the River Mississippi from the Balise up to Fort Chartres," said map being dated 1770.

(4) Copy of the General Cullot map entitled "Map of the Course of the Mississippi from the Missouri and the Country of the Illinois to the Mouth of this River," being of date 1826.

(5) Copy of plat of original entries and survey of Township 15 North, Range 2 East, Warren County, Mississippi, and of Township 14 North, Range 2 East, Warren County, Mississippi.

(6) Copy of plat of original entries and survey of Township 15 North, Range 14 East, Madison Parish, Louisiana, of Township 14 North, Range 13 East, Madison Parish, Louisiana; and of Township 14 North, Range 14 East, Madison Parish, Louisiana.

(7) (a) Copy of map of Louisiana State Board of Engineers of a date prior to the year 1867.

(b) Copy of map of Second Division, Louisiana Levees, embracing the right bank of the Mississippi River, surveyed under the direction of Capt. J. A. Porter, Chief Engineer, Second Division, Louisiana Levees, 1866, drawn by Fred Y. Dabney, Assistant Engineer.

(8) Copy of Map No. 20 with title made by Major Suter from Survey of Year 1874, scale: 1 inch to 1 mile.

(9) Copy of Map No. 18 published by Mississippi River Commission in 1883 from Survey of 1882 with subsequent surveys to the year 1899 superimposed thereon.

(10) Copy of Mississippi River Commission Charts Nos. 49 and 50 of the years 1878-1880.

(11) Copy of Mississippi River Commission Chart No. 49 of the years 1882-1883, 1895, 1908, and subsequent survey of 1912 superimposed thereon.

(12) Copy of Mississippi River Commission Chart No 51 showing survey of 1913.

(13) Copy of Map No. 18 on scale of 1 inch to 1 mile, published by Mississippi River Commission in 1916 from survey of 1913.

(14) Copy of Mississippi River Commission Chart No. 51 of the years 1913-1915.

(15) Copy of Map No. 19 published by Mississippi River Commission in 1916 on scale of 1 inch to 1 mile made from Survey of 1913.

(16) Copy of map of the Davis Island Quadrangle of United States Engineers showing topography in the year 1929.

(17) Copy of the Yokena Quadrangle of United States Engineers showing topography of the year 1930.

(18) Copy of three sheets covering area of Yokena Quadrangle and Davis Island Quadrangle, Mississippi River Low Water Survey of the years 1929 and 1930, being Sheet No. 3 of Mississippi River Commission Low Water Survey.

(19) Copy of Sheet No. 2 of Mississippi River Commission Low Water Survey of the years 1929-1930.

(20) Copy of Sheet No. 8 of Mississippi River Commission Low Water Survey of the years 1929-1930.

(21) Copy of Sheet No. 9 of Mississippi River Commission Low Water Survey of the years 1929-1930.

(22) Copy of Yokena Quadrangle published with Map Edition of 1935 showing the topography in 1930-1932.

(23) Copy of Mississippi River Commission Yokena Quadrangle Map published in 1939.

(24) Copy of Yokena Quadrangle published with Map Edition of 1950 based on surveys of 1935-1938 and 1940.

(25) Copy of Yokena Quadrangle published with Map Edition of 1951 based on surveys of 1935-1938 and 1940.

(26) Copy of Davis Island Quadrangle published with Map Edition of 1935 showing the topography in 1930-1932.

(27) Copy of Mississippi River Commission Davis Island Quadrangle Map published in 1939.

(28) Copy of Davis Island Quadrangle published with Map Edition of 1950 based on surveys of 1935-1938 and 1940.

(29) Copy of Davis Island Quadrangle published with Map Edition of 1951 based on surveys of 1935-1938 and 1940.

(30) Copy of map of Mississippi River Commission showing comparison of changes in course of Mississippi River below mouth of Arkansas River of the year 1765 with 1930.

(31) Copy of map of Mississippi River Commission showing comparison of changes in course of Mississippi River below mouth of Arkansas River of the year 1820 with 1930.

(32) Copy of map of Mississippi River Commission showing comparison of changes in course of Mississippi River below mouth of Arkansas River of the year 1861 with 1930.

(33) Copy of map of Mississippi River Commission showing comparison of changes in course of Mississippi River below mouth of Arkansas River of the years 1881-1893 with 1930.

(34) Copy of map of Mississippi River Commission showing comparison of changes in course of Mississippi River below mouth of Arkansas River of the years 1913-1921 with 1930.

(35) Copy of map of Mississippi River Commission showing comparison of changes in course of Mississippi River below mouth of Arkansas River of the years 1765, 1820 period, 1861, 1881-1893, 1913-1921 with 1930.

(11)

That, as aforesaid, the sovereignty of the State of Mississippi has thus been infringed by the State of Louisiana, and hence it is necessary that the boundary between the states at the aforesaid points and between the aforesaid points be determined by competent authority in order that each state may collect taxes on the property in dispute which rightfully belongs to it, and that the territorial jurisdiction of each state should be fixed to enable each state to exercise its proper civil and criminal jurisdiction.

That the Honorable R. F. Kennon is the Governor of the State of Louisiana and the Honorable Fred LeBlanc is the Attorney General thereof, and the official residence of each of them is in the City of Baton Rouge, State of Louisiana.

Wherefore, the premises considered, Complainant, the State of Mississippi, prays that the State of Louisiana be cited to answer hereto, through its said Governor and said Attorney General, and that after all necessary orders and proceedings, there be judgment of your Honorable Court fixing and determining the boundary line between the said states on and along the western part of the County of Warren, State of Mississippi between the points hereinabove designated in this Complaint.

The State of Mississippi,
Complainant,

By (s) Hugh L. White,
The Governor of said State,
Jackson, Mississippi,
By (s) J. A. Ireman,
The Attorney General of said
State, Jackson, Mississippi.

(s) G. H. Brandon

G. H. BRANDON,
Natchez, Mississippi,
Member of Firm of
BRANDON, BRANDON, HORNSBY & HANDY,
Special Assistant Counsel.